GULF CRANE SERVICES, INC.
P. O. Box 1843
Covington, LA 70434-1843
Ph: (985) 892-0056
Fax: (985) 892-4061

To: Joe Levine

From: Charlie Bollinger, Jr.

Date: October 17, 2001

Re: MMS Proposed Changes – Reference API Spec. 2C

Per our conversation on 10/16/01, I am responding to the MMS proposed CFR changes:

(a) *Will the addition of API Spec. 2C to MMS's documents incorporated by reference increase safety and safe operations on the OCS?*
Comment: Yes

(b) *Are there other standards for offshore cranes that may be appropriate for MMS to incorporate as part of MMS's regulations?*
Comment: Not necessarily.

(c) *When should MMS require all cranes on OCS fixed platforms to be fully compliant with API Spec. 2C?*
Comment: Will there be any grandfather clause on cranes existing that have worked for years? How do you expect some of the existing cranes to be compliant with API Spec. 2C if they weren't built to 2C or even 2C monogrammed cranes? Complying with 2C is more than just adding anti-two blocking systems. In many cases, the material data you are requiring doesn't exist. Some manufacturing companies aren't even in business to obtain that information. This could require significant engineering and testing to acquire all material data, and in some cases, may be almost impossible due to the cost. I spoke with the major swing bearing manufacturer about the old Rotec bearings meeting the latest 2C

edition and they stated that their old bearing material didn't meet the Charpy requirements. The Charpy requirements on bearings is a concern in cold weather conditions, which is not a problem in the Gulf of Mexico, however many existing bearings will not meet the latest edition of 2C requirements. Rotec has rebuilt many replacement bearings that will not comply even though they were built under the old 2C requirements.

What about the refurbishing of an older existing API 2C crane or even converting a mechanical 2C crane to hydraulic?

What about a qualified engineer's approval of refurbishing an existing or a used crane? Some of the existing cranes could require more than a year to make them compliant due to the economic impact it could have on a customer with numerous mechanical cranes. It would require much more than $4,000.00 to even install two blocking shut down systems.

(d) *Is a 1-year transition period enough time for industry to comply with the change proposed in §250.108(c)?*

Comment: One year may not be enough for existing mechanical cranes but should be acceptable for hydraulic cranes.

(e) *Should MMS establish a requirement similar to the U.S. Coast Guard (USCG), which requires cranes to be installed according to an approved crane plan and inspected and load tested by an Agency-approved third party when the crane is installed?*

Comment: Cranes should be installed by an approved crane plan by a qualified engineer. Cranes should not require certification of ABS, ICGB, or other type representative, which is an additional cost when the engineer should be the authority with stamped drawings used.

(f) *Should MMS require all new cranes for installation on OCS fixed platforms to have an API monogram on the nameplate of the crane as evidence of certification of the anti-two block safety device?*

Comment: Monogram on the nameplate of the crane shouldn't be confused with the certification of the anti-two blocking device as long as it has sound engineering and will work properly with a shut down or audible alarm. Maybe there should be consideration of an audible alarm for existing mechanical cranes only.

What if a crane located on an existing structure is not an API monogram crane? Can an engineer review it? And, then what if the crane does meet API 2C's latest edition? Should it have a monogram plate even if it isn't a monogrammed crane?

(g) *Should a rental crane that is installed on OCS fixed platforms be considered a new crane and, therefore, be required to be fully compliant with API Spec 2C?*

Comment: A rental crane should not be considered to be a new crane but should have to meet 2C requirements and be approved by a qualified engineer.

(h) *Should MMS limit the type of anti-two block devices that are acceptable? What are the known failure rates of the different types?*
Comment: All hydraulic cranes should have a shut down system. Regarding mechanical cranes: Mechanical type cranes should allow for audible alarms until a major overhaul or upgrade of the crane can be performed. Due to economic effect, allow more time to retrofit.

(i) *Should MMS consider an additional cost factor for retrofitting existing cranes with the anti-two block safety device (e.g., an associated cost for the amount of time a crane is expected to be out-of-service while it is being retrofitted)?*
Comment: Only in the case of mechanical cranes.

Recording Keeping Requirements: There will be cases in which the records of maintaining, design, construction, and installation of the cranes are not available. However, records on two blocking systems shouldn't be a problem if it requires a new installation.

Physical Requirements: Riggers should have the same physical requirements as crane operators, especially the eye test, since color and depth perception apply to their duties.

Documentation should be required. We have worked out a simple paperwork and monitoring system for both operators and riggers.

Thanks for your consideration and time. I will be happy to discuss these items in more detail when I return.

F:\WPDOCS\GCS\mms.DOC